

David J. Noonan, *Pro Hac Vice* (\*MA Bar No. 373260)  
**LAW OFFICE OF DAVID J. NOONAN**  
32 Tanglewood Road  
Amherst, Massachusetts, 01002  
(413) 549-5491  
[noonan@law-din.com](mailto:noonan@law-din.com)

Gary N. Lento (028749)  
**RADIX LAW**  
15205 N. Kierland Blvd., Suite 200  
Scottsdale, Arizona 85254  
(602) 606-9300  
[lento@radixlaw.com](mailto:lento@radixlaw.com)

*Attorneys for Plaintiff FAVORITE HEALTHCARE STAFFING, LLC*

**UNITED STATES DISTRICT COURT**

## DISTRICT OF ARIZONA

Favorite Healthcare Staffing, LLC, a Kansas limited liability company,

Case No.: 2:23-cv-01810-DJH

Plaintiff,

VS.

IASIS Healthcare Holdings, Inc., St. Lukes Medical Center, L.P., and Mountain Vista Medical Center, L.P..

Corporate Defendants.

end

Ralph de la Torre; Michael Callum; and Christopher Dupleavy;

## Individual Defendants

**PLAINTIFF'S NOTICE OF  
WITHDRAWAL OF PLAINTIFF'S  
MOTION TO ENFORCE  
SETTLEMENT AGREEMENT  
WITHOUT PREJUDICE**

(Assigned to the Honorable  
Diane J. Humetewa)

111

1 Plaintiff, Favorite Healthcare Staffing, LLC, d/b/a Favorite Healthcare (“Plaintiff”  
2 and/or “Favorite Healthcare”), hereby requests this Court to withdraw Plaintiff’s *Motion and*  
3 *Memorandum of Points and Authorities to Enforce Settlement Agreement*, and its *Exhibits A*  
4 through E (Docs. 44 through 44-5) without prejudice. The parties have resolved their disputes.

5 DATED: April 26, 2024

6 **LAW OFFICE OF DAVID J. NOONAN**

7  
8 /s/ David J. Noonan  
9 David J. Noonan, Esq. (Pro Hac Vice)  
10 32 Tanglewood Road  
Amherst, Massachusetts, 01002  
[noonan@law-djn.com](mailto:noonan@law-djn.com)

11 **RADIX LAW**

12 Gary N. Lento, Esq.  
13 15205 N. Kierland Blvd., Suite 200  
14 Scottsdale, Arizona 85254  
(602) 606-9300  
[lento@radixlaw.com](mailto:lento@radixlaw.com)

15  
16 *Attorneys for Plaintiff FAVORITE HEALTHCARE*  
17 *STAFFING, LLC*

---

28 PLAINTIFF’S MOTION TO WITHDRAW MOTION TO ENFORCE SETTLEMENT AGREEMENT

**CERTIFICATE OF SERVICE**

I hereby certify that on April 26, 2024, the foregoing document and any attachments were emailed to the participants as listed below.

Brendan A. Melander  
Brandon Stein  
**HUSCH BLACKWELL LLP**  
2415 E. Camelback Road, Suite 500  
Phoenix, AZ 85016  
[Brendan.Melander@huschblackwell.com](mailto:Brendan.Melander@huschblackwell.com)  
[Brandon.Stein@huschblackwell.com](mailto:Brandon.Stein@huschblackwell.com)

Matthew D. Knepper (*Pro Hac Vice*)  
Theresa M. Mullineaux (*Pro Hac Vice*)  
**HUSCH BLACKWELL LLP**  
8001 Forsyth Blvd., Suite 1500  
St. Louis, MO 63105  
[Matthew.Knepper@huschblackwell.com](mailto:Matthew.Knepper@huschblackwell.com)  
[Theresa.Mullineaux@huschblackwell.com](mailto:Theresa.Mullineaux@huschblackwell.com)  
*Attorneys for Defendants*

By: /s/ Gary N. Lento  
Gary N. Lento

**PLAINTIFF'S MOTION TO WITHDRAW MOTION TO ENFORCE SETTLEMENT AGREEMENT**